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Attorneys for Defendant  
7 FORD MOTOR COMPANY

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10

11 DAX PIERSON )

Case No.: C-06-06503 PJH

12 Plaintiff, )

13 vs. )

**JOINT MOTION TO AMEND CASE  
MANAGEMENT AND PRETRIAL  
MOTION**

14 PATRICK SCOTT; ON THE MOVE, INC.; )  
15 DIGBY ADLER GROUP, LLC; BANDAGO )  
VAN RENTAL; AND DOES 1-50, inclusive )

16 Defendants, )

17 DIGBY ADLER GROUP, LLC., dba )  
18 BANDAGO VAN RENTAL, and ON THE )  
19 MOVE, INC., )

20 Cross-Complainants, )

21 vs. )

22 FORD MOTOR COMPANY )

23 Cross-Defendant, )  
24  
25  
26  
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JOINT MOTION TO AMEND CASE  
MANAGEMENT AND PRETRIAL ORDER  
CASE NO. C-06-06503 PJH

1 Plaintiff Dax Pierson ("Pierson") and Defendant Ford Motor Company ("Ford") have met  
 2 and conferred with respect to expert discovery and respectfully move this Court to amend the  
 3 January 18, 2007 Case Management and Pretrial Order as follows:

4 The parties will disclose experts and areas of testimony on June 15, 2007 per the Court's  
 5 January 18, 2007 order. Depositions of Pierson's experts on each topic will precede Ford's experts  
 6 on each topic. Ford's corresponding expert will be deposed a minimum of 60 days after Pierson's  
 7 expert. Pierson's experts will have 30 days after each defense expert's deposition to serve a rebuttal  
 8 report. If Ford needs to take an additional deposition based on Pierson's rebuttal reports, Pierson  
 9 will make those experts available thereafter.

10 This agreed-to schedule will not permit expert and non-expert discovery to be completed by  
 11 the current deadline of August 15, 2007. Instead, the parties anticipate completing expert and non-  
 12 expert discovery by October 15, 2007.

13 Good cause exists to amend the Court's order to extend the discovery cutoffs to October 15,  
 14 2007. The trial of this matter is set for February 11, 2008, nearly six months after the current August  
 15 15, 2007 discovery cutoff. The parties have agreed to a schedule and procedure for expert discovery  
 16 that will allow for an orderly exchange of each party's respective theories and opinions, while in no  
 17 way impacting the February 11, 2008 trial date. Therefore, Pierson and Ford respectfully request that  
 18 this Court amend the Case Management and Pretrial Order to extend the discovery cutoffs to  
 19 October 15, 2007.

20  
 21  
 22 DATED: June 14, 2007

SHOOK, HARDY & BACON, L.L.P.

23  
 24 By: 

H. GRANT LAW  
 SARA TROPEA  
 AMIR NASSIHI  
 Attorneys for Defendant  
 Ford Motor Company

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1  
2 DATED: June 14, 2007

LAW OFFICES OF THOMAS J. BRANDI

3  
4 By: Daniel Dell'Oso

DANIEL DELL'OSSO  
Attorney for Plaintiff  
Dax Pierson

5  
6  
7 IT IS SO ORDERED.

8 DATED: 6/25/07

9  
10  
11 THE DISPOSITIVE MOTIONS HEARING  
12 DEADLINE WILL NOT BE  
13 CONTINUED.

